UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE "A MILLION LITTLE PIECES" LITIGATION	No. 06-md-1771 Hon. Richard J. Holwell

AFFIDAVIT OF THOMAS E. PAKNAS IN SUPPORT OF JOINT PETITION FOR ATTORNEYS' FEES AND REIMBURSEMENTS OF COSTS FILED BY DALE & PAKENAS

STATE OF ILLINOIS)
) ss.:
COUNTY OF COOK)

Thomas E. Pakenas, being duly sworn, deposes and says:

1. I am a partner of the firm of Dale & Pakenas, I am submitting this affidavit in support of my firm's application for an award of attorneys' fees in connection with services rendered in the above-entitled action ("The Action") and the reimbursement of expenses incurred by my firm in the course of this litigation.

2. My firm acted as one of plaintiff's counsel in this class action. The tasks undertaken by my firm can summarized as follows:

> Research and evidence gathering via computer and media review. Preparation and filing of documents including pleadings and summonses. Multiple Appearances at judicial hearings in Cook County regarding the state filing Number 06 CH 772. Review and consideration of Filings, Pleadings, and Motions in the Federal MDL. Meetings and consultations with client and meetings with Chicago Counsel of defendants and fellow plaintiffs.

3. The chart attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by the partners of my firm who were involved in this litigation, and the lodestar calculation based upon my firm's current billing rates for such personnel in the final year of employment by my firm. As reflected therein, my firm expended a total of 51.75 hours on this

litigation from the inception of the case to the present, with a total lodestar amount of $15,525.00.[1] Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

4. The hourly rates for the partners in my firm included in Exhibit "A" are the same as the regular current rates charged for their services in non-contingent matters and/or which have been accepted and approved in other class action matters in this District.

5. The chart attached hereto as Exhibit "B" is my firm's itemization of un-reimbursed expenses incurred in the total amount of $ 404.35. In connection with the prosecution of this litigation.

6. The expenses incurred in this Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred in connection with the prosecution of the litigation.

7. With respect to the standing of counsel in this case, attached hereto as Exhibit "C" is a brief biography of my firm and attorneys in my firm who were principally involved in this litigation.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of September, 2007.

SWORN TO BEFORE ME
this 27th day of September 2007

Notary Public

Pakenas

OFFICIAL SEAL
ANGELINA VANDERMOLEN
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:05/05/11

[1] The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm, which are available for inspection upon request of the Court.

EXHIBIT "A"

IN RE "*A MILLION LITTLE PIECES*" LITIGATION 06-MD-1771

BILLING

FIRM NAME: DALE & PAKENAS

REPORTING PERIOD: January 1, 2006 through September 25, 2007

ATTORNEY NAME	TOTAL HOURS	HOURLY RATE	TOTAL LODESTAR
Thomas E. Pakenas	51.75	300.00	$ 15,525.00
TOTAL		N/A	$ 15,525.00

EXHIBIT "B"

IN RE "*A MILLION LITTLE PIECES*" LITIGATION 06-MD-1771

EXPENSES

FIRM NAME: DALE & PAKENAS

REPORTING PERIOD: January 1, 2006 through September 25, 2007

TYPE OF EXPENSE	CUMULATIVE TOTAL
Computerized Legal Research (Westlaw, Lexis, Dialog, etc.)	$
Court Cost & Filing Fees	$ 294.00
Court Reporters & Transcripts	$
Photocopying	$
Postage, Messenger & Express Mail, FedEx	$
Professional Services (Experts, Investigators, etc.)	$ 65.40
Telephone & Fax	$
Travel, Hotels, Meals	$
Miscellaneous	$ 44.95
TOTAL	$ 404.35

EXHIBIT "C"

Dale & Pakenas is a litigation firm exclusively representing plaintiffs in various tort litigation including but not limited to medical malpractice, products liability, construction negligence, and automotive liability. Thomas E. Pakenas the partner involved in the litigation at issue has been or is currently involved in class action disputes involving Jewel milk salmonella, breast implants, and McDonald's gluten. Mr. Pakenas was the first to file this action and a review of the various complaints clearly indicates his was the template for many of the subsequent filings.